



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EAG/JDG/CMP  
F.#2008R00530

271 Cadman Plaza East  
Brooklyn, New York 11201

March 24, 2012

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Thomas Gioeli, et al.  
Criminal Docket No. 08-240 (S-6) (BMC)

Dear Judge Cogan:

The government respectfully submits this motion in response to the defendant Dino Saracino's oral motion on Thursday, March 22, 2012, pursuant to Federal Rule of Evidence 615 ("Rule 615"), to permit only one testifying agent in the courtroom for the pendency of the trial. The Court directed the government to respond to Saracino's motion by Saturday, March 24, 2012. The government does not oppose the motion and will exclude all government witnesses - with the exception of Special Agent Scott Curtis with the Federal Bureau of Investigation. In addition,

the government moves, pursuant to Rule 615, to exclude any defense witnesses from the courtroom.

Respectfully submitted,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Elizabeth Geddes  
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cc: Adam D. Perlmutter, Esq. (by ECF)  
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